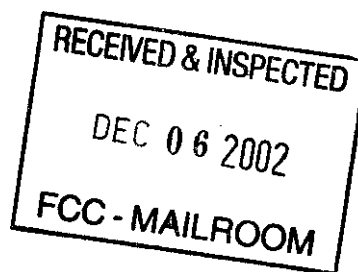


TRW Space & Electronics

One Space Park
Redondo Beach, CA 90278
3108124321

November 22, 2002



Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket 99-200, Petition of the CPUC for Technology-Specific
Overlay Area Codes

Dear Ms. Dortch:

Like many businesses in the South Bay of Los Angeles, we are concerned about the decisions being made regarding the 310 area code. While we understand that there is a shortage of telephone numbers in the 310 area code, we do not feel that an area code split is a solution to the problem.

The implications of a split to businesses are huge. The change causes business disruption, a potential loss of customer contact, and is very costly. Our estimation is that the implementation of an area code change would cost us nearly one half million dollars. This follows a split that occurred in 1991 that was just as, if not more, costly to us. Additionally, at this point, we don't have any assurances that we would not be faced with another change in the next few years. Businesses cannot continually take on costs and impacts like this and still remain competitive.

We encourage the FCC and any others who influence decisions regarding area codes to consider all of the impacts to business very carefully. Area code splits are not the answer. The possibility of a technology overlay gives us all the ability to keep our current numbers and assign a different area code to unseen numbers, such as ATMs. This is helpful and permits us to retain our current numbers, but as we understand, is only a temporary solution. A long-term solution to the area code problem needs to be found and implemented before we are faced with these same issues again in five years.

Sincerely,

A handwritten signature in cursive script that reads "Richard E. Peterson".

No. of Copies rec'd _____
List A B C D E

Richard E. Peterson
Director, Business & Facilities Services

cc: The Honorable Jane Harman